

(DATE)

Selectboard  
Town of Charlotte, Vermont  
P.O. Box 119  
Charlotte, Vermont 05445

We have audited the financial statements of the Town of Charlotte, Vermont as of and for the year ended June 30, 2015 and have issued our report thereon dated (DATE). We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in “Government Auditing Standards”, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

In planning and performing our audit, we considered the Town of Charlotte, Vermont’s internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Town of Charlotte, Vermont’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Town of Charlotte, Vermont’s internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls. However, as discussed as follows, we identified certain deficiencies in internal control that we consider to be significant deficiencies

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies in internal control, such that there is a reasonable possibility that a material misstatement of the Town of Charlotte, Vermont’s financial statements will not be prevented, or detected and corrected, on a timely basis. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. We consider the deficiencies described in the accompanying Schedule of Deficiencies in Internal Control and Other Recommendations as Items 2015-1 through 2015-3 to be significant deficiencies.

We have also noted other matters during our audit as indicated in the accompanying Schedule of Deficiencies in Internal Control and Other Recommendations that are opportunities for strengthening internal control and operating efficiency. We have discussed the recommendations with the staff during the course of fieldwork and some of the recommendations may have already been implemented.

This communication is intended solely for the information and use of management, the Selectboard, and others within the Town of Charlotte, Vermont, and is not intended to be, and should not be, used by anyone other than these specified parties. If you would like to discuss any of the recommendations further, please feel free to contact us.

We would like to take this opportunity to thank the staff of the Town of Charlotte, Vermont for their assistance and cooperativeness throughout our audit. It has been a pleasure working with you.

Respectfully submitted,

SULLIVAN, POWERS & CO.  
Certified Public Accountants

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

DRAFT

Deficiencies in Internal Control:

Material Weaknesses:

None noted.

Significant Deficiencies:

2015-1 Authorization of General Journal Entries

*Criteria:*

Internal controls should be in place that requires appropriate officials to authorize and review all adjustments to the books of original entry.

*Condition:*

The Town does not have a policy in place to require authorization or review of adjustments to the books of original entry.

*Cause:*

Unknown.

*Effect:*

This deficiency in the internal control structure could allow other working control policies to be circumvented.

*Recommendation:*

We recommend that the Town enact a policy that requires appropriate officials to authorize and review all general journal entries so as not to circumvent the original approval process.

2015-2 Wastewater Unbilled Revenue

*Criteria:*

Internal controls should be in place to ensure that the unbilled wastewater revenue is recorded properly at year end.

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

**DRAFT**

*Condition:*

The Town bills for wastewater usage once per year in April for the usage in the prior year. This billing crosses fiscal years and should be allocated accordingly. The Town did not adjust the unbilled wastewater revenue account to allocate the billing properly across fiscal years.

*Cause:*

Unknown.

*Effect:*

The Town's unbilled wastewater revenue account balance was incorrect.

*Recommendation:*

We recommend the Town implement controls to ensure that an estimated receivable for wastewater usage is recorded in the current fiscal year that has not yet been billed.

2015-3 Netting Revenues and Expenditures

*Criteria:*

Revenue should not be netted with the expenditures in order to conform with generally accepted accounting principles.

*Condition:*

The Town netted a paving grant with the related expenditures account during the year. This nets out the revenue and expenditures as if they did not exist and results in the understatement of both revenue and expenditures.

*Cause:*

The Town was not aware that this practice is not in accordance with generally accepted accounting principles.

*Effect:*

This will result in understatement of revenue and expenditures.

*Recommendation:*

We recommend that the Town not net revenue and expenditures to ensure revenue and expenditures are not understated.

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

DRAFT

Other Recommendations:

Accounting and Procedures Manual

The Town does not have an accounting and procedures manual in place. This manual should define duties and responsibilities for current personnel so as to prevent or reduce misunderstandings, errors, inefficient or wasted effort, duplicated or omitted procedures, and other situations that can result in inaccurate or untimely accounting records. It will also help to ensure that all similar transactions are treated consistently, that accounting principles used are proper, and that records are produced in the form desired by management. A good accounting manual should aid in the training of new employees and possibly allow for delegation to other employees.

We recommend that the Town develop this document for all accounting procedures as soon as possible. Each individual should document their duties and how to perform them. The manual should include examples of forms with descriptions of their use. Once developed, only changes in procedures or forms will require changes in the manual.

We believe this time will be more than offset by time saved later in training and supervising accounting personnel. Also, in the process of the comprehensive review of existing accounting procedures for the purpose of developing the manual, management might discover procedures that can be eliminated or improved to make the system more efficient and effective.

We also recommend that the Town make sure that there are no jobs related to accounting and finance that only one person knows how to perform. The procedures manual would also be useful in determining whether this situation exists.

Fraud Risk Assessment

The Town has not performed a fraud risk assessment. A fraud risk assessment is important because it identifies the Town's vulnerabilities to fraudulent activities and whether those vulnerabilities could result in material misstatement of the financial statements. The fraud risk assessment would also identify processes, controls, and other procedures used to mitigate the identified fraud risks.

We recommend the Town perform a fraud risk assessment to reduce the possibility of fraudulent activities.

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

**DRAFT**

Fraud Policy

The Town does not have a fraud policy in place. A fraud policy outlines the Town's position on fraudulent activities and dishonest conduct and sets out procedures for employees to report suspected fraud or misconduct to the appropriate personnel within the Town. This policy should further outline the responsibilities of different positions within the Town in regards to reporting and investigating these claims. It should also discuss the actions that will be taken to investigate the claim and the protection that will be afforded to the person making the claim against retaliation from the accused.

We recommend that the Town implement a fraud policy.

Cash Register

The Town does not use a cash register. A cash register serves as a good control over cash. Cash should be reconciled to the register tape as the daily receipts are being deposited.

We recommend that the Town consider the purchase of a cash register so better control over cash can be achieved.

Allocation of Interest

The Town internally pools cash in the General Fund and reports a corresponding due from/to other funds to allocate cash balances. The Town does not allocate interest to all the other funds. They only record interest income in the General Fund.

We recommend that the Town consider allocating interest monthly based on average balances.

Investment and Banking Policy

The Town does not have a formal investment and banking policy. This policy is extremely important in establishing and maintaining cash management in accordance with Selectboard directives. This policy should include general guidance for the Treasurer in the areas of bank selection, types of investments and policies for minimizing the risk of losses.

We recommend that the Selectboard and the Treasurer work together to establish guidelines for the Treasurer in the areas of cash management and investing.

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

DRAFT

Incomplete Accounting System

Each fund is a separate accounting entity and should employ a general ledger to summarize operating activity during the year and record corresponding increases or decreases in the individual asset and liability account balances. The general ledger is a primary control device in any double entry accounting system. If properly and regularly maintained, the account balances will facilitate prompt and complete financial reporting at the end of any operating period. The individual accounts, particularly the asset and liability accounts, will provide control for reconciliation with other data from internal or external sources. The Trustee of Public Funds Fund is not under general ledger control. The Trustee of Public Funds Fund financial statements are compiled at year end from summary data.

We recommend that the Town maintain this fund in their general ledger and implement reconciliation procedures for all key accounts on a regular basis.

Documentation of Internal Control System

A solid understanding of internal control is essential to a well run organization. An organization must continually assess their internal control systems to evaluate financial health, ensure accurate financial reporting and comply with laws and regulations. As part of this process, management should formally document its control systems.

This will provide management with an understanding of the systems related to financial reporting and the controls over relevant assertions related to all significant accounts, disclosures in the financial statements, antifraud programs and controls over selection and application of accounting policies.

We recommend that the Town document the internal control process. This should break out the internal control process into the following five areas:

1. Control Environment – Sets the tone of an organization and is the foundation for all other components.
2. Risk Assessment – Identification and analysis of relevant risks to achieve its objectives, forming a basis for how risks should be managed.
3. Control Activities – The policies and procedures that help ensure management directives are carried out.
4. Information and Communication – The identification, capture and exchange of information in a form and timeframe that enables people to carry out their responsibilities.
5. Monitoring – The process that assesses the quality of internal control performance over time.

TOWN OF CHARLOTTE, VERMONT  
SCHEDULE OF DEFICIENCIES IN INTERNAL CONTROL  
AND OTHER RECOMMENDATIONS  
JUNE 30, 2015

DRAFT

Budgeting for Unanticipated Expenses

The Town budgets a separate line item for unanticipated expenses. These unanticipated expenses should be recorded by their type and/or purpose and in the appropriate departments.

We recommend that the Town not charge any amounts to the unanticipated expenses line item.

Recording of Settlement

The Town received a settlement from the Vermont Electric Power Company for their underpayment of prior year property taxes. The Town recognized this money in the Repairs and Improvements Fund rather than in the General Fund.

We recommend that the Town recognize this type of revenue in the General Fund and then transfer the funds to other funds when authorized.